

Locum Life Privacy Policy

1. Introduction

We manage personal information in accordance with our Privacy Policy, the Privacy Act 1988 and the Australian Privacy Principles (APPs). This policy applies to information collected by Locum Life Recruitment PTY LTD. We only collect information that is reasonably necessary for the proper performance of our activities or functions. We do not collect personal information just because we think it could be useful at some future stage if we have no present need for it. We may decline to collect unsolicited personal information from or about you and take steps to purge it from our systems.

1.1. Locum Life Recruitment PTY LTD

Locum Life is a provider of doctors to the acute, mental health and primary healthcare markets in Australia. We work closely with clients across Australia and cover all areas of healthcare delivery, from some of the largest metropolitan centers, regional base hospitals, small rural facilities, and GP practices.

Changes to Privacy Policy

It is possible that the wording and/or content of this policy may change from time to time as legislation, our business or technology advances. For that reason, we encourage you to check and keep yourself informed of this policy regularly.

1.2. Information Flow

When we collect your personal information:

- we check that it is reasonably necessary for our business functions and / or activities as a medical recruitment company;
- we check that it is current, complete and accurate. This will sometimes mean that we have to cross-check the information that we collect from you with third parties;
- we record and hold your information in our Recruitment Management System. Some information may be disclosed to overseas recipients, including our related or contracted businesses in the United Kingdom, Ireland, Canada, New Zealand, South Africa, Asia and / or India;
- we retrieve your information when we need to use or disclose it for our functions and activities. At that time, we check that it is current, complete, accurate and relevant. This will sometimes mean that we have to cross-check the information that we collect from you with third parties once again - especially if some time has passed since we last checked;
- subject to some exceptions, we permit you to access your personal information in accordance with APP:12 of the APPs;
- we correct or attach associated statements to your personal information in accordance with APP:13 of the APPs;

we destroy or de-identify your personal information when it is no longer needed for any purpose for which it may be used or disclosed provided that it is lawful for us to do so. We do not destroy or de-identify information that is contained in a Commonwealth Record.

2. Kinds of information that we collect and hold

Personal information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and activities as a medical recruitment company and is likely to differ depending on whether you are:

- a Candidate;
- a Client;
- a Referee.

2.1. For Candidates

A candidate is someone who engages with our business, either directly or indirectly, for the purpose of finding or being offered a placement with an employer. The type of information that we typically collect and hold about Candidates is information that is necessary to assess amenability to work offers and work availability; suitability for placements; or to manage the performance in work obtained through us and includes:

- Qualifications
- Registration Certificates
- Curriculum Vitae's
- Passport Information
- Address, phone numbers and e-mail addresses
- Certain health-related documents, such as vaccination status
- References about you as a person, and / or your professional responsibilities.

2.2. For Clients

A client is someone other than a candidate who engages with our business, either directly or indirectly, for the purpose of acquiring one or more of our services. The type of information that we typically collect and hold about Clients is information that is necessary to help us manage the presentation and delivery of our services and includes:

- Names and contact details of your employees
- Work schedules, rosters, and related information
- Teams, structures, roles related to any vacancies you may be recruiting for
- Banking, payment and financial information, including credit checks.

2.3. For Referees

A referee is someone from whom we may have sought, or who has offered to provide, personal and professional information regarding the performance and suitability of a candidate for future employment. The type of information that we typically collect and hold about Referees is information that is necessary to help to make determinations about the suitability of one of our Candidates for particular jobs or particular types of work and includes:

Your name, contact details and role within the organisation;
Your relationship to the candidate for whom you are providing a reference;
Any information you may provide as part of a referee report.

3. Purposes

The purposes for which we collect, hold, use and disclose your personal information are likely to differ

depending on whether you are:

- a Candidate;
- a Client;
- a Referee.

The following sections are also relevant to our use and disclosure of your personal information:

- Our Policy on Direct Marketing (see below)
- Related Purpose Disclosures and Overseas Disclosures (see below)

3.1. For Candidates

Information that we collect, hold, use and disclose about a Candidate is typically used for the following purposes:

- work placement operations;
- recruitment functions, including direct marketing;
- statistical purposes and statutory compliance requirements;
- staff management and training;
- audits and risk management;

3.2. For Clients

Personal information that we collect, hold, use and disclose about Clients is typically used for the

following purposes:

- client and business relationship management;
- recruitment functions;
- staff management and training;
- audits and risk management;
- marketing services to you;
- statistical purposes and statutory compliance requirements;
- sponsorship and employment functions (visas, AoN and DWS applications)

3.3. For Referees

Personal information that we collect, hold, use and disclose about Referees is typically used for the following purposes:

- to confirm identity and authority to provide references;
- Candidate suitability assessment;
- recruitment functions;
- staff management and training;

audits and risk management;

3.4. Our Policy on Direct Marketing

From time to time Locum Life may send e-mail, text message or print communication to its candidates or clients as part of various direct marketing campaigns. We may use the contact details you have provided to us, to include you in these direct marketing campaigns, unless you have specifically requested us not to do so. When you receive marketing-related e-mail communication from us, you have the option to request that your contact details be removed from the distribution list for similar, future direct marketing campaigns. We respect your privacy and endeavor to abide by the requirements of relevant anti-spam legislation.

4. How your personal information is collected

The means by which we will generally collect your personal information are likely to differ depending on

whether you are:

- a Candidate;
- a Client;
- a Referee.

We sometimes collect information from third parties and publicly available sources when it is necessary for a specific purpose such as checking the information that you have given us or where you have consented or would reasonably expect us to collect your personal information in this way. Sometimes the technology that is used to support communications between us will provide personal information to us - see the section in this policy on Electronic Transactions. See also the section on Photos & Images.

4.1. For Candidates

Personal information about you will in most circumstances be collected directly from you by a recruitment consultant to submit an application for a role on your behalf.

Personal information is also collected when:

- You register on our website;
- You provide information over the phone;
- You send us information by e-mail, fax or mail.
- One of your referees provides us with a reference.
- We receive feedback about your professional performance from Clients or related parties.

We receive information from financial, insurance, legal or statutory bodies about you.

We may also collect personal information about you from a range of publicly available sources including AHPRA, the various educational institutions, newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with our Privacy Policy.

4.2. For Clients

Personal information about you may be collected:

- when you provide it to us for business or business-related social purposes;
- through electronic transactions.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with our Privacy Policy.

4.3. For Referees

Personal information about you may be collected from a Candidate or when you provide it to us:

- in the course of our checking Candidate references with you and when we are checking the information that we obtain from you about Candidates;
- when you provide it to us for business or business-related social purposes;
- through electronic transactions.

We may also collect personal information about you from a range of publicly available sources including newspapers, journals, directories, the Internet and social media sites. When we collect personal information about you from publicly available sources for inclusion in our records we will manage the information in accordance with our Privacy Policy.

4.4. Photos & Images

Certain documents that we may request from you, such as your passport, will have a photographic image of yourself included. When you send us these or similar documents or include other photographic images of yourself in electronic communications with us, you agree to us keeping those images on file for the sole purpose of performing our function as a medical recruitment company. We will however not request that you supply photographs, scan photo ID, or capture and retain video image data of you in cases where simply sighting photographs or proof of identity documents would be sufficient in the circumstances.

4.5. Electronic Transactions

Sometimes, we collect personal information that individuals choose to give us via online forms or by email, for example when individuals:

- ask to be on an email list such as a job notification list;
- register as a site user to access facilities on our site such as a job notification board;
- make a written online enquiry or email us through our website;
- submit a resume by email or through our website;

It is important that you understand that there are risks associated with use of the Internet and you should take all appropriate steps to protect your personal information. These may include keeping your online passwords safe and secure, regularly updating your anti-spyware software, and being diligent about the types of information you share via the internet. It might help you to look at the Office of the [Australian Information Commissioner's resource on Internet](#)

[Communications and other Technologies](#). You can contact us by land line telephone or post if you have concerns about making contact via the Internet.

4.5.1. Social Networks and Web Searches

We use internet search engines to collect information about your suitability for positions. Some of the websites we access include Google, various medical registration and regulatory bodies, and the department of Immigration.

4.5.2. Browsing

We collect usage data from our website, such as the pages you visit, the time spent on each page and your server IP address. This information (or metadata) does not identify you personally. You should take care when you browse from one website to another. This Privacy Policy does not apply to any other websites you may visit.

4.5.3. Cookies

When you visit our website, you may notice a pop-up warning that the site uses Cookies. Cookies are a series of digits which create a record of your activity on the website, and enables you to browse more easily when i.e. completing online registration or log-in details. You can set your browser not to accept Cookies, or you can delete Cookies from your browser at the end of the session.

5. How your personal information is held

Personal information is held in our Information Record System until it is no longer needed for any purpose for which it may be used or disclosed at which time it will be de-identified or destroyed provided that it is lawful for us to do so.

We take a range of measures to protect your personal information from:

- misuse, interference, and loss;
- and unauthorised access, modification or disclosure.

Any personal information you provide to us electronically is stored on our Information Record System.

Our employees are obliged to respect the confidentiality of any personal information held by us. We also maintain physical security procedures to manage and protect the use and storage of records containing personal information.

6. Disclosures

We may disclose your personal information for any of the purposes for which it is primarily held or for a lawful related purpose. We may disclose your personal information where we are under a legal duty to do so.

Disclosure will usually be:

- internally and to our related entities
- to our Clients
- to Referees for suitability and screening purposes.

6.1. Related Purpose Disclosures

We outsource a number of services to contracted service suppliers (CSPs) from time to time. Our CSPs may see some of your personal information. Typically our CSPs would include:

- Software solutions providers;
- I.T. contractors and database designers and Internet service suppliers;
- Legal and other professional advisors;
- Insurance brokers, loss assessors and underwriters;
- Superannuation fund managers;
- Background checking and screening agents;

We take reasonable steps to ensure that terms of service with our CSPs recognise that we are bound by obligations to protect the privacy of your personal information and that they will not do anything that would cause us to breach those obligations.

6.2. Cross-Border Disclosures

Some of your personal information is likely to be disclosed to overseas recipients, including our related or contracted businesses, in the United Kingdom, Ireland, Canada, New Zealand, South Africa, Asia and / or India.

7. Access & Correction

Subject to some exceptions set out in privacy law, you can gain access to your personal information that we hold. Important exceptions include:

- evaluative opinion material obtained confidentially in the course of our performing reference checks; and access that would impact on the privacy rights of other people. In many cases evaluative material contained in references that we obtain will be collected under obligations of confidentiality that the person who gave us that information is entitled to expect will be observed. We do refuse access if it would breach confidentiality.

For more information about access to your information see our Access Policy.

For more information about applying to correct your information see our Correction Policy.

7.1. Access Policy

If you wish to obtain access to your personal information you should contact our Privacy officer. You will need to be in a position to verify your identity, and we may levy a charge for making the information available. In some instances, we may refuse to give you access to certain information where:

- the access impacts on the privacy of others;
- the request for access is frivolous or vexatious;
- there are existing or anticipated legal proceedings;
- or such access can be denied under law or by a law enforcement agency.

If we do not agree with making the information available to you, we will notify you of the reasons for that decision within fourteen (14) days of us receiving your initial request for access to the information. You may raise a formal complaint to us in writing, as per the Complaints procedure below.

7.2. Correction Policy

If you find that personal information that we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to correct it by contacting us. We will take such steps as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading. There is no charge to you for asking us to correct your personal information. You should note that it may take up to fourteen (14) days for the relevant information to be corrected in our system.

If we have disclosed personal information about you that is inaccurate, out of date, incomplete, irrelevant or misleading, you can ask us to notify the third parties to whom we made the disclosure and we will take such steps (if any) as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.

If we are not in a position to correct the information, or do not agree that the information should be changed, we will provide you with written notice of that fact. You may request for a statement to be associated with your personal information, indicating that you contest the accuracy or validity of the information on file. You may raise a formal complaint to us in writing, as per the Complaints procedure below.

8. Notifiable Data Breaches

Notifiable Data Breaches Scheme means the scheme under Part IIIIC of the Privacy Act which requires that, in the event personal information is involved in a data breach that is likely to result in serious harm, we must notify each affected individual and the Australian Information Commissioner.

9. Complaints

You have a right to complain about our handling of your personal information if you believe that we have interfered with your privacy.

9.1. Complaints procedure

If you are making a complaint about our handling of your personal information, it should first be made to us in writing. You can make complaints about our handling of your personal information to our Privacy Officer, who can be contacted on Info@locumlife.com.au - You can also make complaints to the [Office of the Australian Information Commissioner](#).

When we receive your complaint:

- We will take steps to confirm the authenticity of the complaint and the contact details provided to us to ensure that we are responding to you or to a person whom you have authorised to receive information about your complaint;

- Upon confirmation we will write to you to acknowledge receipt and to confirm that we are handling your complaint in accordance with our policy.

- We may ask for clarification of certain aspects of the complaint and for further detail;

- We will consider the complaint and may make inquiries of people who can assist us to establish what has happened and why;

We will require a reasonable time (usually 30 days) to respond;

If the complaint can be resolved by procedures for access and correction, we will suggest these to you as possible solutions;

If we believe that your complaint may be capable of some other solution we will suggest that solution to you, on a confidential and without prejudice basis in our response;

If the complaint cannot be resolved by means that we propose in our response, we will suggest that you take your complaint to any recognised external dispute resolution scheme to which we belong or to the [Office of the Australian Information Commissioner](#)